

**Jonathan Stone, Esquire**

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Party in Interest

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEW JERSEY**

In Re:

Diana A. Cook,

Debtor.

) **Case No. 11-45821 (MBK)**

) **Chapter 13**

) **Judge: Michael B. Kaplan**

) **Hearing Date: May 26, 2015 at 9:00am**

) **NOTICE OF CROSS-MOTION FOR  
RELIEF FROM THE AUTOMATIC  
STAY**

) **Oral Argument Requested**

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**PLEASE TAKE NOTICE** that on May 26, 2015 at 9:00am o'clock in the forenoon, or as soon thereafter as counsel may be heard, I shall move before the Honorable Michael B.

Kaplan, 402 East State Street – Courtroom 8, Trenton, New Jersey 08608 for an Order seeking relief from the automatic stay.

**PLEASE TAKE FURTHER NOTICE** that I shall rely upon the herein notice and Cross-Motion, including the legal authorities cited, the supporting declaration, all documents related to the cross-motion, all documents in the Court's file in this action, all matters of which the Court may take judicial notice and any other items the Court deems appropriate.

**PLEASE TAKE FURTHER NOTICE** that in accordance with D.N.J. LBR 9013–2, a memorandum of law is being submitted as I believe that there are complicated or novel issues of law involved in this Cross–Motion.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Local Rule 9013–1(d) of the Rules of Procedure governing the practice before the United States Bankruptcy Court for the District of New Jersey, objections, if any, must be in writing, must confirm to the requirements of the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of New Jersey, set for the name of the objector, the basis for the objection and the specific grounds therefore, and must be filed with the Clerk of the Court at least four (4) days prior to the hearing date indicated herein with copies filed simultaneously served upon:

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**PLEASE TAKE FURTHER NOTICE** that in accordance with Local Rule 9013–1(d) of the Rules of Procedure governing the practice before the United States Bankruptcy Court for the District of New Jersey, failure of any person or entity receiving notice of the Cross–Motion to file objections thereto on a timely basis shall be a bar to the assertion of an objection to the entry by the Court of the proposed Order, as same may be modified, and the within Motion shall be deemed uncontested.

Dated: Sunday, May 17, 2015

By: /s/ Jonathan Stone  
Jonathan Stone, Esq.  
Party in Interest